

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DIVISION OF MISSOURI  
EASTERN DISTRICT**

In re:	)	Case No. 15-48556-705
	)	Judge Charles E. Rendlen, III
JESSICA WHITE,	)	
	)	<b>NOTICE OF FALSE AND/OR</b>
Debtor.	)	<b>MISLEADING STATEMENTS IN</b>
	)	<b>DOCKET ENTRIES NOS. 9 AND 10</b>

Chapter 7 Trustee E. Rebecca Case ("Trustee Case") files this Notice of False and/or Misleading Statements in Docket Entries Nos. 9 and 10 and in support thereof respectfully reports the following:

1. Debtor Jessica White ("Debtor White") filed a Voluntary Chapter 7 Petition for Relief in the United States Bankruptcy Court for the Eastern District of Missouri on November 12, 2015 and a copy of the Order and Notice of Chapter 7 Bankruptcy Case, Meeting of Creditors, & Deadlines ("Notice") is attached hereto and incorporated herein as **Exhibit "1"**.

2. According to the Notice, the Attorney for Debtor is Dean D. Meriwether ("Attorney Meriwether") from the Law Offices of Dean Meriwether located at 3919 Washington Avenue, St. Louis, Missouri.

3. The Meeting of Creditors was scheduled to be held on Friday, December 18, 2015 at 9:00 a.m.

4. Late on the afternoon of Thursday, December 17, 2015 a Debtor contacted Trustee Case and reported that she had been contacted by "Critique Services" and informed that her Meeting of Creditors had been cancelled.

5. Trustee Case responded that the Meeting of Creditors had not been cancelled and that Trustee Case had not been contacted by "Critique Services" or Attorney Meriwether.

6. When Trustee Case arrived at the Thomas F. Eagleton Federal Courthouse on Friday, December 18, 2015, at approximately 7:45 a.m. attorney Robert J. Dellamano ("Attorney Dellamano") was standing in the lobby.

7. Trustee Case proceeded to the 341 Meeting Room.

8. Before the beginning of the Meeting of Creditors scheduled for 9:00 a.m., Attorney Dellamano appeared in the 341 Meeting Room and reported that none of Attorney Meriwether's clients would be appearing for their Meeting of Creditors on Friday, December 18, 2015 and requested that all six cases be continued.

9. However, two Debtors were present in the 341 Meeting Room when Attorney Dellamano made his announcement, Debtor White and Debtor Kay Frances Robinson.

10. Debtor Kay Frances Robinson left the 341 Meeting Room.

11. Debtor White remained and reported to Trustee Case and Attorney Dellamano that she wanted to go forward with her Meeting of Creditors and not miss another day of work.

12. Trustee Case requested that Debtor White and Attorney Dellamano discuss the matter and notify Trustee Case as to how they wished to proceed.

13. Debtor White and Attorney Dellamano consulted and then reported that they wished to proceed with the Meeting of Creditors as scheduled and Attorney Dellamano reported that he would return after filing some documents with the Clerk of the Court.

14. Attorney Dellamano left the 341 Meeting Room and returned after 10:00 a.m.

15. Debtor White's Meeting of Creditors was held.

16. Attorney Dellamano announced that he was appearing on behalf of the Debtor.

17. As of this date, Attorney Meriwether has not withdrawn as the Attorney for Debtor.

18. Attorney Dellamano delivered to Trustee Case the following documents:
  - a. Docket Entry No. 9 filed on Friday, December 18, 2015 at 9:59 a.m.,  
Entry of Appearance with an attachment, Disclosure and Retainer  
Agreement for Legal Representation ("Retainer Agreement"), a copy of  
which is attached hereto and incorporated herein as **Exhibit "2"**; and
  - b. Docket Entry No. 10 filed on Friday, December 18, 2015 at 10:00 a.m.,  
Disclosure of Compensation of Attorney for Debtor(s) ("Attorney's  
Disclosure of Compensation"), a copy of which is attached  
hereto and incorporated herein as **Exhibit "3"**.

**RETAINER AGREEMENT, ATTACHMENT TO EXHIBIT "2"**

**(DOCKET ENTRY NO. 9)**

19. The Retainer Agreement, attachment to **Exhibit "2"**, states the following:  
"Attorney Meriwether has issue(sic) me a partial refund and I have retained the services of  
Attorney Dellamano."

20. However, the Debtor testified that she has received no refund from Attorney  
Meriwether and she has not paid or agreed to pay Attorney Dellamano any money.

21. Attorney Dellamano aggressively asked the Debtor if she had read the Retainer  
Agreement before she signed it on December 15, 2015.

22. The Debtor became flustered, admitted signing the Retainer Agreement on  
December 15, 2015 but was adamant that she had not received a refund from Attorney  
Meriwether and she had not paid or agreed to pay Attorney Dellamano any money.

23. Attorney Dellamano identified his signature followed by the date "12/18/15" on  
the Retainer Agreement.

24. Later, Attorney Dellamano admitted that the Debtor's testimony in regard to **Exhibit "2"**, the Retainer Agreement, was accurate: The Debtor received no refund from Attorney Meriwether, the Debtor had paid no money to Attorney Dellamano, and the Debtor had not agreed to pay Attorney Dellamano in the future. The Retainer Agreement contains false and/or misleading statements.

**ATTORNEY'S DISCLOSURE OF COMPENSATION, EXHIBIT "3"**

**(DOCKET ENTRY NO. 10)**

25. **Exhibit "3"**, the Attorney's Disclosure of Compensation, states "For legal services, I have agreed to accept \$100.00" and "Prior to the filing of this statement I have received \$100.00" and the Balance Due is "0.00".

26. When shown the Attorney's Disclosure of Compensation, Debtor again denied that she had agreed to pay or had paid Attorney Dellamano \$100.00.

27. In addition, the Attorney's Disclosure of Compensation states "The source of the compensation paid to me was: Debtor" and "The source of compensation to be paid to me is: Debtor".

28. Again, the Debtor denied that she paid Attorney Dellamano or that she had agreed to pay Attorney Dellamano in the future.

29. The Attorney's Disclosure of Compensation also states "I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm."

30. Attorney Dellamano identified his signature and the date "12/18/15" on the Attorney's Disclosure of Compensation.

31. Attorney Dellamano admitted that the Debtor's testimony in regard to Attorney's Disclosure of Compensation was accurate: Attorney Dellamano had no agreement with the Debtor to be paid \$100.00, Attorney Dellamano had not been paid \$100.00 by the Debtor or anyone else, and the source of any compensation to be paid to Attorney Dellamano was not the Debtor. The Attorney's Disclosure of Compensation contains false and/or misleading statements.

32. Attorney Dellamano's response to Attorney's Disclosure of Compensation, number 5, was "I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm". Attorney Dellamano's testimony in regard to this response was inconclusive.

WHEREFORE, Chapter 7 Trustee E. Rebecca Case files this Notice of False and/or Misleading Statements in Docket Entries Nos. 9 and 10 in this case pursuant to her understanding of the Orders that have been entered by the Honorable Charles E. Rendlen, III in several cases in regard to "Critique Services", Dean Meriwether and/or Robert J. Dellamano.

STONE, LEYTON & GERSHMAN  
A Professional Corporation

By: /s/ E. Rebecca Case  
E. Rebecca Case- EDMO#38010MO  
7733 Forsyth Boulevard, Suite 500  
St. Louis, Missouri 63105  
(314) 721-7011  
(314) 721-8660 Facsimile  
chapter7trustee@stoneleyton.com

*Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent via first class,  
United States mail, postage prepaid and/or electronic notice on December 21, 2015 to:

1. Jessica White Debtor  
2173 Orbit Drive  
St. Louis, MO 63136
2. Dean D. Meriwether Attorney for Debtor  
Law Office of Dean Meriwether  
3919 Washington Avenue  
St. Louis, MO 63108
3. Robert J. Dellamano Second Attorney for Debtor  
Law Office of Robert J. Dellamano  
100 S. 4<sup>th</sup> Street, Suite 550  
St. Louis, MO 63102
4. Paul Randolph  
Office of the United States Trustee  
Thomas F. Eagleton Courthouse  
111 South Tenth Street, Suite 6353  
St. Louis, Missouri 63102

/s/ E. Rebecca Case

E. Rebecca Case

## UNITED STATES BANKRUPTCY COURT

Eastern District of Missouri

## Order and Notice of Chapter 7 Bankruptcy Case, Meeting of Creditors, &amp; Deadlines

A chapter 7 bankruptcy case concerning the debtor(s) listed below was filed on 11/12/15.

You may be a creditor of the debtor. This notice lists important deadlines. You may want to consult an attorney to protect your rights. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below. NOTE: The staff of the bankruptcy clerk's office cannot give legal advice.

**Creditors -- Do not file this notice in connection with any proof of claim you submit to the court.**  
**See Reverse Side For Important Explanations.**

Debtor(s) (name(s) and address):

Jessica White  
 2173 Orbit Dr.  
 St. Louis, MO 63136

Case Number:  
 15-48556-A705

Last four digits of Social Security or Individual Taxpayer-ID (ITIN)  
 No(s)/Complete EIN:

8178

Attorney for Debtor(s) (name and address):

Dean D. Meriwether  
 Law Offices of Dean Meriwether  
 3919 Washington Avenue  
 St. Louis, MO 63108  
 Telephone number: 314-533-4357

Bankruptcy Trustee (name and address):

E. Rebecca Case  
 7733 Forsyth Blvd.  
 Suite 500  
 Saint Louis, MO 63105  
 Telephone number: (314) 721-7011

## Meeting of Creditors:

Date: December 18, 2015

Time: 09:00 AM

Location: 111 South Tenth Street, First Floor, Room 1.310, St. Louis, MO 63102

Refer to Other Side for Important Documentation Needed at the Meeting of Creditors

## Presumption of Abuse under 11 U.S.C. §707(b)

See "Presumption of Abuse" on reverse side.

The presumption of abuse does not arise.

## Deadlines:

Papers must be received by the bankruptcy clerk's office by the following deadlines:

## Deadline to Object to Debtor's Discharge or to Challenge Dischargeability of Certain Debts: 2/16/16

The deadline to file such complaints for any creditor added to this case after the date of the initial Notice and Order of Commencement shall be the later of the original deadline or 60 days after the date on the certificate of service of the notice given pursuant to L.R. 1009.

## Deadline to Object to Exemptions:

Thirty (30) days after the conclusion of the meeting of creditors unless otherwise provided under Bankruptcy rule 1019(2)(B) for converted cases.

## Please Do Not File a Proof of Claim Unless You Receive a Notice To Do So.

## Foreign Creditors

A creditor to whom this notice is sent at a foreign address should read the information under "Do Not File a Proof of Claim at This Time" on the reverse side.

## Address of the Bankruptcy Clerk's Office:

111 South Tenth Street  
 Fourth Floor  
 St. Louis, MO 63102  
 Telephone numbers: (314) 244-4500  
 VCIS number: 1-866-222-8029, #87

Electronic Case Information/PACER: <https://ecf.moeb.uscourts.gov>

Office Hours: Monday - Friday 8:30 a.m. - 4:30 p.m.

So Ordered:



United States Bankruptcy Judge

Date: 11/13/15





Case 15-48556 Doc 12 Filed 12/21/15 Entered 12/21/15 15:24:16 Main Document  
Pg 8 of 12

MIME-Version: 1.0  
From: cmcfadmin@moeb.uscourts.gov  
To: ecf\_user@localhost.localdomain  
Bcc: MO06@ecfbis.com, USTPRegion13.SL.ECF@USDOJ.gov, attydeanmeriwether@yahoo.com, chapter7trustee@stoneleyton.com, dellamanolaw@gmail.com, ecfnotices@ascensioncapitalgroup.com  
Do not notice for BK case:  
Message-Id: <1944824@moeb.uscourts.gov>  
Subject: 15-48556 Notice of Appearance  
Content-Type: text/html

\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court  
Eastern District of Missouri

Notice of Electronic Filing

The following transaction was received from Robert James Dellamano entered on 12/18/2015 at 9:59 AM CST and filed on 12/18/2015

Case Name: Jessica White  
Case Number: 15-48556  
Document Number: 2

Docket Text:

Notice of Appearance and Request for Notice by Robert James Dellamano Filed by Debtor Jessica White. (Dellamano, Robert)

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: 15-48556 White.pdf

Electronic document Stamp:

[STAMP bkecfStamp\_ID=1031339175 [Date=12/18/2015] [FileNumber=19448246-0] [25cbd0f039415b7afbfb373867a03e09a7b2ac4ae25792b685a113fe0684360771e462054b1a6e1524da9648dcf9e81ebc189f77c9b5866f6e828cf624785d5ff]]

15-48556 Notice will be electronically mailed to:

E. Rebecca Case  
chapter7trustee@stoneleyton.com, MO06@ecfbis.com

Robert James Dellamano on behalf of Debtor Jessica White  
dellamanolaw@gmail.com, dellamanolaw@gmail.com

Dean D. Meriwether on behalf of Debtor Jessica White  
attydeanmeriwether@yahoo.com

Office of US Trustee  
USTPRegion13.SL.ECF@USDOJ.gov

15-48556 Notice will not be electronically mailed to:

Exeter Finance Corp.  
Ascension Capital Group  
P.O. Box 201347  
Arlington, TX 76006





UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

In: Jessica White

Debtor

)  
)  
)  
)  
)  
)  
)

Case No.: 15-48556  
Chapter 7

**ENTRY OF APPEARANCE**

Comes Now, Robert J. Dellamano, Attorney at Law, and enters his appearance as sole legal counsel for Debtor.



Robert J. Dellamano #63106861L  
Attorney at Law  
100 S. 4<sup>th</sup> Street, Ste. 550  
St. Louis, MO 63102  
(314) 499-6900 office  
(314) 300-4650 fax  
robert.dellamano@yahoo.com

**CERTIFICATE OF SERVICES:**

By my signature below it is certified that a copy of the above was served this 18<sup>th</sup>  
day of December 2015 by ECF system and/ or first class mail to the following:

E. Rebecca Case  
7733 Forsyth Ste. 500  
Clayton, MO 63105

Jessica White  
2173 Orbit Dr  
Saint Louis, MO 63136



Robert Dellamano, Attorney at Law



15-48556

## DISCLOSURE AND RETAINER AGREEMENT FOR LEGAL REPRESENTATION

Pursuant to this retainer agreement, Jessica White,  
("the client") retains Robert Dellamano, Attorney At Law, to enter his appearance in the  
client's pending bankruptcy. By his/her signature below, the client acknowledges that  
this retainer agreement has been read in full and that the client agrees to the terms of this  
retainer agreement. The client acknowledges and agrees to the following terms:

1. **Disclosure.** The client acknowledges that he/she has previously retained Dean  
Meriwether, Attorney At Law, as legal counsel in the client's pending bankruptcy. On  
December 7, 2015, the Bankruptcy Court entered an Order, which suspends the right of  
Attorney Meriwether from practicing in the Bankruptcy Court until March 7, 2016 and  
imposes other restrictions. The client understands that this Order presently prohibits  
Attorney Meriwether from representing the client in his/her pending bankruptcy case.

Attorney Meriwether has issue me a partial refund and I have retained the services of  
Attorney Dellamano.

To protect the interests of the client, Attorney Meriwether has requested the assistance of  
Attorney Dellamano, on behalf of his clients. The legal representation of Attorney  
Dellamano is offered to the client pursuant to the terms and conditions of this Disclosure  
and Retainer Agreement For Legal Representation. The client understands that the client  
is not required to retain Attorney Dellamano as his/her legal counsel and is free to seek  
out legal representation from any other attorney.

2. **Retention of Robert Dellamano as legal counsel for the Client.** By the client's  
signature below, the client retains Robert Dellamano as his/her legal counsel and  
authorizes Attorney Dellamano to enter his appearance in the client's pending  
bankruptcy and provide all legal services required by the client in said bankruptcy.

Jessica White  
Client

12/15/15  
Date

If Joint, Client

[Signature]  
Attorney At Law

12/18/15  
Date

MIME-Version: 1.0  
From: cmecfadmin@moeb.uscourts.gov  
To: ecf\_user@localhost.localdomain  
Cc: MO06@ecfbis.com, USTPRegion13.SL.ECF@USDOJ.gov, attydeanmeriwether@yahoo.com, chapter7trustee@stoneleyton.com, dellamanolaw@gmail.com, ecfnofices@ascensioncapitalgroup.com  
Do not notice for BK case:

Message-Id: <19448251@moeb.uscourts.gov>  
Subject: 15-48556 Disclosure of Compensation of Attorney for Debtor

Content-Type: text/html

\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court  
Eastern District of Missouri

Notice of Electronic Filing

The following transaction was received from Robert James Dellamano entered on 12/18/2015 at 10:00 AM CST and filed on 12/18/2015

Case Name: Jessica White

Case Number: 15-48556

Document Number: 10

Docket Text:

Disclosure of Compensation of Attorney for Debtor Filed by Debtor Jessica White. (Dellamano, Robert)

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: 15-48556 White 2016B.pdf

Electronic document Stamp:

[STAMP bkcfStamp\_ID=1031339175 [Date=12/18/2015] [FileNumber=19448249-0] [1ad5cb05b4c088877f1a9b4d18f3af310374c8cec13d438528f3955e9b06551195a6a1f6f90ec3440d2e9c477e8fd3949aed3248df379941af75840ba0df290f]]

15-48556 Notice will be electronically mailed to:

E. Rebecca Case  
chapter7trustee@stoneleyton.com, MO06@ecfbis.com

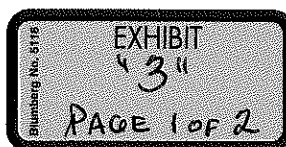
Robert James Dellamano on behalf of Debtor Jessica White  
dellamanolaw@gmail.com, dellamanolaw@gmail.com

Dean D. Meriwether on behalf of Debtor Jessica White  
attydeanmeriwether@yahoo.com

Office of US Trustee  
USTPRegion13.SL.ECF@USDOJ.gov

15-48556 Notice will not be electronically mailed to:

Exeter Finance Corp.  
Ascension Capital Group  
P.O. Box 201347  
Arlington, TX 76006



United States Bankruptcy Court  
Eastern District of Missouri

In re Jessica White

Debtor(s)

Case No. 15-48556

Chapter 7

**DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)**

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	<u>100.00</u>
Prior to the filing of this statement I have received	\$	<u>100.00</u>
Balance Due	\$	<u>0.00</u>

2. \$ 0.00 of the filing fee has been paid.
3. The source of the compensation paid to me was:  
☒ Debtor ☐ Other (specify):
4. The source of compensation to be paid to me is:  
☒ Debtor ☐ Other (specify):
5. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.  
☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:  
a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;  
b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;  
c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;  
d. [Other provisions as needed]
7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:  
**Representation of the debtors in adversary proceeding.**

**CERTIFICATION**

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Date

12/18/15

Robert J. Dellamano

Signature of Attorney

Law Office of Robert J. Dellamano

100 S. 4th Street Ste. 550

Saint Louis, MO 63102

314-499-6900 Fax: 314-300-4650

robert.dellamano@yahoo.com

Name of law firm

